

# **EXHIBIT A**

# GIDEON, COOPER & ESSARY

A PROFESSIONAL LIMITED LIABILITY COMPANY

315 DEADERICK STREET, SUITE 1100

NASHVILLE, TENNESSEE 37238

(615) 254-0400

FAX (615) 254-0459

www.gideoncooper.com

C. J. GIDEON, JR.<sup>1</sup>  
DIXIE W. COOPER<sup>2</sup>  
BRYAN ESSARY<sup>3</sup>  
CHRIS J. TARDIO<sup>4</sup>  
CHRISTOPHER A. VRETTOS  
ALAN S. BEAN  
JAMES C. SPERRING  
JOSHUA R. ADKINS  
KIM J. KINSLER<sup>5</sup>  
RANDA VON KANEL  
J. BLAKE CARTER<sup>1</sup>  
MARK A. HAMMERVOLD<sup>1</sup>  
MATT H. CLINE  
JOHN-MARK ZINI<sup>6</sup>

<sup>1</sup>LICENSED IN TN & FL  
<sup>2</sup>LICENSED IN TN, AL & TX  
<sup>3</sup>LICENSED IN TN & GA  
<sup>4</sup>LICENSED IN TN & KY  
<sup>5</sup>LICENSED IN TN & WI  
<sup>6</sup>LICENSED IN TN & KS

September 17, 2013

J. Gerard Stranch, IV  
Branstetter, Stranch & Jennings, PLLC  
227 Second Avenue North  
Nashville, TN 37201

Mark P. Chalos  
Lieff Cabraser Heimann & Bernstein, LLP  
150 4<sup>th</sup> Avenue North, Suite 1650  
Nashville, TN 37219

**Re: Meningitis Litigation**

Dear Gerard and Mark:

In previous hearings in the MDL, the PSC has referenced "informal" discovery from NECC and has now specifically referenced thousands of documents produced by NECC to the PSC. As you know, despite the PSC's expectation that we evaluate our exposure for purposes of mediation, we have not been given access to any of these documents. Additionally, we are not privy to the scope of any agreement between the PSC and NECC related to NECC's production of information.

Please consider this our formal request for access, through the PSC, to this "informal" discovery from NECC. We formally request copies of any and all documents produced to the PSC by NECC, preferably in electronic form or via electronic access to any document repository.

Thank you.

Very truly yours,



Chris J. Tardio

cc: CJ Gideon, Jr. (via email)

Bcc: Matt Cline (via email)  
John-Mark Zini (via email)